

1 ARIEL E. STERN, ESQ.
Nevada Bar No. 8276
2 NATALIE L. WINSLOW, ESQ.
Nevada Bar No. 12125
3 PAIGE L. MAGASTER, ESQ.
Nevada Bar No. 15557
4 AKERMAN LLP
1635 Village Center Circle, Suite 200
5 Las Vegas, Nevada 89134
Telephone: (702) 634-5000
6 Facsimile: (702) 380-8572
Email: ariel.stern@akerman.com
7 Email: natalie.winslow@akerman.com
Email: paige.magaster@akerman.com

8 *Attorneys for NewRez LLC d/b/a*
9 *Shellpoint Mortgage Servicing*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12
13 RESOURCES GROUP, LLC, AS TRUSTEE OF
14 THE THOMPSON DRIVE TRUST,

15 Plaintiff,

16 v.

17 NEWREZ LLC dba SHELLPOINT
18 MORTGAGE SERVICING; DOE individuals I
through XX; and ROE CORPORATIONS I
through XX,

19 Defendants.

Case No.: 2:22-cv-00272-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

(FOURTH REQUEST)

20 Plaintiff Resources Group, LLC as Trustee of the Thompson Drive Trust (**Resources Group**)
21 and Defendant NewRez LLC d/b/a Shellpoint Mortgage Servicing agree that Shellpoint shall have
22 an additional twenty-one (21) days, up to and including **April 15, 2022**, to respond to the complaint.

23 The current deadline for Shellpoint to respond to Resources Group's complaint is March 25,
24 2022. The complaint was filed on January 14, 2022 and served on January 21, 2022. Shellpoint
25 removed this action to federal court on February 11, 2022. The court granted the parties' request to
26 extend the initial response deadline of February 18, 2022, by seven days on February 15, 2022. ECF
27 No. 11. The court granted the parties' second request to extend the response deadline by an
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1 additional fourteen days on February 28, 2022. ECF No. 18. The court also granted the parties' third
2 request to extend the response deadline by an additional fourteen days on March 14, 2022.

3 Good cause exists to extend this deadline. Counsel for Shellpoint discovered a substitution
4 of trustee and full reconveyance recorded against the property as instrument number 20220314-
5 0000260 on March 24, 2022, while finalizing Shellpoint's response to the complaint. Counsel for
6 Shellpoint was unaware, prior to March 24, 2022, that the deed of trust had been reconveyed. Upon
7 discovering this information, Shellpoint's counsel reached out to opposing counsel. Resource
8 Group's counsel was likewise unaware the debt secured by the deed of trust had been discharged and
9 the deed of trust reconveyed. Counsel for Shellpoint and Resources Group require additional time to
10 confirm the source of the payoff with their clients, and the parties must decide how to proceed with
11 the subject litigation in light of this significant change in circumstances.

12 This is the parties' fourth request for an extension of this deadline and is not intended to
13 cause any delay or prejudice to any party.

14 DATED this 25th day of March 2022.

AKERMAN LLP	ROGER P. CROTEAU & ASSOCIATES, LTD
<p>15 <u>/s/ Paige L. Magaster</u> 16 ARIEL E. STERN, ESQ. 17 Nevada Bar No. 8276 18 NATALIE L. WINSLOW, ESQ. 19 Nevada Bar No. 12125 20 PAIGE L. MAGASTER, ESQ. 21 Nevada Bar No. 15557 22 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134</p> <p>Attorneys for NewRez LLC d/b/a Shellpoint Mortgage Servicing</p>	<p><u>/s/ Christopher L. Benner</u> ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 CHRISTOPHER L. BENNER, ESQ. Nevada Bar No. 8963 2810 W. Charleston Boulevard, Suite 75 Las Vegas, NV 89102</p> <p>Attorneys for Resources Group, LLC as Trustee of the Thompson Drive Trust</p>

23 **IT IS SO ORDERED.**

24 
25 **UNITED STATES MAGISTRATE JUDGE**
26 Case No. 22-cv-00272

27 **DATED:** March 25, 2022
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